

## **Exhibit C**

### **Plaintiff's Redacted Declaration**

**April 23, 2025**

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Student DOE #1  Plaintiff,  v.  Donald J. TRUMP, in his official capacity, President of the United States of America;  William JOYCE, in his official capacity as ICE Enforcement and Removal Operations New York Field Office Director;  Todd M. LYONS, in his official capacity, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security; and  Kristi NOEM, in her official capacity, Secretary, U.S. Department of Homeland Security;  Defendants.	Case No.  <b>DECLARATION OF XXXX XXXXX</b>
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1. My name is XXXX XXXXX.
2. I am over eighteen years of age and am competent to testify regarding the matters described below.
3. I am a citizen of China, and I currently live in Brooklyn, New York.
4. I graduated with a Masters in Architecture from XXXXX, and graduated in May, 2024.

5. After graduation, I obtained my Optional Practical Training work authorization pursuant to my F-1 visa and studies and began working for XXXXXX in May of 2024. I have been continuously employed by the same employer since that date.
6. On June 13, 2017, I was involved in a dispute with my roommate and was charged with a violation of Oregon Revised Statutes with Class A Misdemeanor Menacing. Although I was charged with the misdemeanor menacing charge in municipal court in Portland, Oregon, I was never convicted because the prosecutor dismissed the charges. I disclosed this offense on my student visa application in 2021. I was requested to provide the criminal records from the Portland case as well as my criminal record in China. After two months of administrative processing and consideration of the criminal records, the Department of State Consulate in Guangzhou, approved the visa and I entered the United States.
7. On April 8, 2025 at 2:18 PM, I received an email from the International Student and Scholars Office at XXXXXXXX. The email stated that “OGS is regularly monitoring F-1 and J-1 student SEVIS records and we discovered that Student and Exchange Visitor Program (SEVP) has terminated your SEVIS record. The termination reason listed in SEVIS is: OTHER-- Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated. Unfortunately, we have no other information about this termination, and SEVP has not been able to provide us with any information. The termination of your SEVIS record means that you no longer have valid F-1 nonimmigrant status. This means you are no longer lawfully allowed to stay in the U.S. Restated, your form I-20 is no longer valid. Your EAD is no longer valid, and you no longer have authorization to work. If your visa has been revoked this means that the

F-1 visa in your passport is no longer valid. If you are in the U.S., ou may need to make place for immediate departure if you are currently inside the U.S. The letter encouraged me to hire an immigration lawyer.

8. My employer, upon finding out that my SEVIS had been terminated, terminated my employment and has halted my immigration processes.
9. My work authorization expires on May 19, 2025, and before I was laid off, I had plans of entering the H-1B lottery next year, and changing my status in the United States. I also planned on extending my work authorization.
10. However, now my employer is unwilling to continue with my case. Given the unexpected nature of my current circumstances, I am unable to change status to another valid nonimmigrant status, unable to change employers, unable to apply for enrollment at a different school or doctorate program and unable to pursue other post-graduate opportunities.
11. Before I was laid off, I was earning \$48,000 a year as a drafting architect and my prospects for continued employment and growth were good.
12. The loss of my employment has significantly affected my career trajectory, my mental health, and my earning potential.
13. Over the past week, since finding out about my SEVIS termination and losing my job, I have suffered from extreme stress and anxiety that I may lose everything that I have worked so hard to obtain over the past 7 years of graduate study and OPT. I am frightened that I will be arrested, transferred and deported like so many other students I am hearing about on the news.
14. I live every day in fear and will not rest until this is resolved.

I declare under penalty of perjury that the foregoing is true and correct. (U.S. Code, Title 28 U.S.C. section 1746).

Dated, April 16, 2025

/s/ XXXX XXXXX

XXXX XXXXX